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6 Attorneys for Plaintiff
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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10
11 **United States of America,**

12 Plaintiff,

13 v.

14 **Katherine Kaplan,**

15 Defendant.

2:12-CR-488-LDG-VCF

MOTION FOR DOWNWARD

DEPARTURE

16
17 The United States, by and through Daniel G. Bogden, United States Attorney, and
18 Daniel R. Schiess, Assistant United States Attorney, moves for the court to grant the defendant a
19 two-level downward departure for having provided substantial assistance. The defendant met with
20 the FBI four times and provided information about the fraudulent scheme in which she was
21 involved and is the basis of her conviction. The defendant's information was consistent with other
22 information possessed by the FBI. The information may help the FBI advance the investigation of
23 this matter.

24
25 DANIEL G. BOGDEN
United States Attorney

26 /s/ Daniel R. Schiess

DANIEL R. SCHIESS
Assistant United States Attorney

Certificate of Service

I certify that a copy of the foregoing motion was served on defense counsel of record through the court's electronic filing system.

Dated: April 26, 2013

/S/ Daniel R. Schiess

Daniel R. Schiess

ORDER

IT IS SO ORDERED.

DATED this 29th day of April, 2013.



Lloyd D. George
Sr. U.S. District Judge